



1313 North Market Street
P.O. Box 951
Wilmington, DE 19899-0951
302 984 6000

www.potteranderson.com

Sarah E. DiLuzio
Associate
Attorney at Law
sdiluzio@potteranderson.com
302 984-6279 Direct Phone
302 658-1192 Fax

January 16, 2007

EFILING and HAND DELIVERY

The Honorable Sue L. Robinson
United States District Court
844 King Street
Wilmington, Delaware 19801

Re: Debra-Ann Wellman v. E. I. du Pont de Nemours and Company
Civil Action No.: 05-279 (SLR)

Dear Judge Robinson:

I write on behalf of Defendant E. I. du Pont de Nemours and Company ("DuPont") in anticipation of the status conference scheduled for January 19, 2007 at 9:00 A.M. in the above-referenced matter.

As indicated in my November 28, 2006 cover letter enclosing the latest stipulation to extend scheduling deadlines, the plaintiff failed to appear for her properly-noticed deposition on October 26, 2006. Because Your Honor referenced plaintiff's failure to appear for deposition in the notice scheduling the status conference, I felt it appropriate to advise the Court that, since that time, the plaintiff has been deposed.

Nonetheless, there are still matters that we believe warrant Your Honor's attention, specifically, the plaintiff's continued failure to provide written responses to DuPont's long-outstanding discovery requests. Indeed, plaintiff has never even submitted initial disclosures, as required by Fed. R. Civ. P. 26(a). DuPont is entitled to full responses to its outstanding discovery requests before it engages in summary judgment briefing. Although we have been unable to prevail upon the plaintiff to fulfill her discovery obligations, we are hopeful that an in-person status conference with Your Honor will motivate plaintiff to be more diligent in her prosecution of this case.

Respectfully,

A handwritten signature in cursive script that reads "Sarah E. DiLuzio".

Sarah E. DiLuzio
Delaware Bar #4085

cc: John M. Stull, Esquire (via CM/ECF)
772298